

Subject: Re: CPRA request (GD.2019.07.06.e) GD.2019.06.29.a GD.2019.06.29.b GD.2019.07.05.a GD.2019.07.06.a
From: [REDACTED]
Date: 7/19/19, 5:00 PM
To: "Keith Yanov" <keith.yanov@greendot.org>

Dear Mr. Yanov,

Thank you for your timely response. Please note the only reason your new attorney, Mr. Strumpfer, adduces for not supplying these records is that the amount of work involved in supplying them is so high that, per section 6255(a) of the CPRA, the public interest in saving GD the expenditure of necessary resources *clearly* outweighs the public interest in producing the records.

Further, note that on June 28, 2019 Green Dot produced without objection more than 5,300 emails in response to a number of requests made in April 2019. In other words, Green Dot has performatively admitted that a review and production rate of about 2,500 emails per month is within its capabilities.

Finally, note that these 5,300 emails have so far been quoted in two distinct stories in the Los Angeles Times, a number of blog posts by esteemed educational scholar Diane Ravitch, and many, many other essays and reports in a wide variety of publications. The public interest in seeing the results of the five substantially similar requests at issue here is not only incalculably high, therefore, but it is demonstratively so.

If you could ask your counsel to explain the court's holding in *Weaver v. Superior Court* 224 Cal.App.4th 746 (2014) you will begin to understand why your refusal to provide these records is exceedingly unlikely to stand up to a challenge. A challenge, that is, of the very sort that I will bring if you don't reverse in writing on or before Monday, July 29, 2019 your refusal to produce these records.

That being said, I do understand that the CPRA does not require GD to expend unlimited resources on responding to my requests. It is also my understanding that, although the law imposes very strict statutory deadlines on response, it does not impose any explicit deadlines on production.

With these facts in mind I am, therefore, perfectly happy to go on as we have been, with Green Dot producing about 2,500 emails per month. If you come to your senses and agree to provide responsive emails, I would be happy to receive them at this rate once per month.

Please let me know your thoughts as soon as possible, but, as I said, not later than July 29, 2019. Or, as you've mentioned, have Wayne Strumpfer let me know the thoughts of your organization.

Thanks, Mr. Yanov.

[REDACTED]
On Fri, Jul 19, 2019, at 4:22 PM, Keith Yanov wrote:

Dear [REDACTED]

This correspondence is in response to your six (6) emails dated June 29, 2019 (two emails), July 5, 2019 (one email), and July 6, 2019 (three emails) in which you requested records pursuant to the California Public Records Act ("PRA"), California Government Code Section 6250 et seq.

For the record, the following re-states your requests by quoting your language in the aforementioned emails:

Request No. 1 (June 29, 2019 at 8:45 am):

I am writing to seek the opportunity to look at emails in the specified timespans in the possession of anyone on the first list below and anyone at any of the domains or email addresses on the subsequent lists. I will also need to see all attachments to these emails in their native formats:

1. Dr. Cristina de Jesus
2. Annette Gonzalez
3. Leilani Abulon
4. Dr. Gordon Gibbings
5. Damon Hands
6. Dr. Alyce Prentice
7. Xochitl Avellan
8. Taiala Carvalho Regnier
9. Meghan McGuire